

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AFT LOCAL 2121, ET AL.,

Plaintiffs,

v.

ACCREDITING COMMISSION FOR
COMMUNITY AND JUNIOR COLLEGES,
et al.,

Defendants.

Case No. [3:16-cv-03411-HSG](#) (KAW)

**ORDER REGARDING 2/15/17 JOINT
LETTER**

Re: Dkt. No. 88

On February 15, 2017, the parties filed a joint discovery letter regarding the terms of a stipulated protective order, and ACCJC's responses and objections to Plaintiffs' Third Set of Requests for Production of Documents. (Joint Letter, Dkt. No. 88 at 1.) Thereafter, the joint letter and all other discovery disputes were referred to the undersigned. (Dkt. No. 89.)

Upon review of the joint letter, the Court orders the parties to stipulate to the Northern District's Model Protective Order for Standard Litigation, subject to the agreed upon modification to ¶ 9, whereby ACCJC would inform a non-party institution, whose information is requested, of the discovery request within 10 days, and the institution would then have 21 days to object or seek a protective order. (Joint Letter at 2.) The stipulated protective order shall be filed within 7 days with the required declaration of counsel. (*See* Judge Westmore's General Standing Order ¶ 11.) Should one or more of the parties later deem other modifications to the stipulated protective order necessary, they shall meet and confer in an attempt to obtain a stipulation. A motion to modify should only be filed if those efforts prove futile.

Furthermore, within 14 days of the entry of the protective order, ACCJC shall provide supplemental responses to Plaintiffs' Third Request for Production of Documents. Should any disputes arise pertaining to those responses or any other discovery device, the parties shall meet

and confer in an attempt to narrow the disputed requests, and the scope thereof, before filing a subsequent joint letter. All future joint letters shall be formatted to comply with the Court's Standing Order:

A. Request No. 3

[Summarize the issue and reproduce the request.]

Plaintiff's Position

[Plaintiff's position outlining why Defendant's response or position is deficient and the relief requested.]

Defendant's Position

[Defendant's rationale as to why it has fully responded to the request, etc.]

B. Request No. 4

[Summarize the issue and reproduce the request.]

Plaintiff's Position

[Plaintiff's position outlining why Defendant's response or position is deficient and the relief requested.]

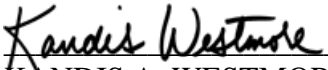
Defendant's Position

[Defendant's rationale as to why it has fully responded to the request, etc.]

(See Judge Westmore's General Standing Order ¶ 13.) Compliance with the format provided will facilitate the Court's resolution of any remaining disputes, as the parties will be addressing the same issues. Additionally, for each disputed request, the parties should address Rule 26's proportionality requirement.

IT IS SO ORDERED.

Dated: February 24, 2017


KANDIS A. WESTMORE
United States Magistrate Judge